



**COUNTY OF TEHAMA  
DEPARTMENT OF PUBLIC WORKS**

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March 08, 2018

F-18-004

Amanda Montgomery  
Environmental Program Manager  
State Water Resources Control Board  
1001 I Street, P.O. Box 2000  
Sacramento, CA 95812

**RE: Comments on the proposed Fee Structure Options for FY 18/19 Temporary Permit for Underground Storage.**

Dear Ms. Montgomery,

The Tehama County Groundwater Sustainability Agency (GSA) is providing comments on the proposed Fee Structure Options for FY 18/19 Temporary Permits for Underground Storage. The Tehama County GSA recommends that *Option 1: Retain current fee*, be implemented for FY 18/19. Although the Tehama County GSA doesn't currently conduct any Underground Storage projects, we see this process as a valuable tool that could be used in the future to encourage groundwater recharge and the sustainable management of the 10 groundwater subbasins within our jurisdiction. We also understand that there is a cost born by the Board in overseeing this permitting process, however it would be unfortunate if the costs were increased to a point that they might discourage participation.

The Tehama County GSA is in the process of developing several Groundwater Sustainability Plans (GSP's) as is required by the Sustainable Groundwater Management Act of 2014 (SGMA). These plans not only detail how the Tehama County GSA will sustainably manage the groundwater resources within its jurisdiction, but will also identify potential projects that could facilitate this process. One potential project type could include applying excess storm flows to agricultural properties in order to passively recharge shallow aquifers. This type of recharge could also be beneficial to both Groundwater Dependent Ecosystems, and the interconnected relationship between surface and groundwater resources.

The Tehama County GSA recommends that the Board implement Option 1 for FY18/19, and to reach out to GSA's from throughout the State over the next year requesting assistance with development of several permit types and fee options. Additionally GSA's could help recommend a schedule for increasing fees in a way that encourages initial participation while also providing a path for the program to become self-sustaining. A process that includes input from GSA's will help to develop a set of diverse project types and

reasonable fees that will be more practical than a one size fits all approach. The Board has an opportunity to help develop a program that will promote the wise use of excess storm flows to assist with the sustainable management of the groundwater resources within the State.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Teubert", is written over a horizontal line.

Ryan Teubert, Manager  
Tehama County Groundwater Sustainability Agency